

SWORN STATEMENT OF WILLIAM GERALD FRIEDT, JR.

- - -

Sheraton Inn-North
910 Sheraton Drive
Mars, Pennsylvania 16046

Saturday, July 23, 1994 - 9:16 a.m.

- - -

PRESENT:

RON PARRY, ESQ., of the law firm
of Arnzen, Parry & Wentz, P.S.C., 600 Greenup
Street, P.O. Box 472, Covington, Kentucky
41012-0472.

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I N D E X

WITNESS	EXAMINATION BY	PAGE
WILLIAM GERALD FRIEDT, JR.	Mr. Parry	3

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1 WILLIAM GERALD FRIEDT, JR.
2 having been first duly sworn, testified and
3 said as follows:

4 EXAMINATION

5 BY MR. PARRY:

6 Q Would you state your full name,
7 please.

8 A William Gerald Friedt, Jr.

9 Q Can you spell your last name.

10 A F-r-i-e-d-t.

11 Q Is it okay if I call you Jerry?

12 A Yes, please.

13 Q Okay, Jerry. My name is Ron
14 Parry, and I've just introduced myself to you.
15 I'm an attorney from Cincinnati, Ohio. I'm
16 looking into some lawsuits in this area
17 relating to Metropolitan Life Insurance
18 Company, and that's why we've asked you to
19 come here today to ask you some questions
20 about the operation of the Butler office of
21 Metropolitan Life Insurance Company. Do you
22 understand that?

23 A Yes, I do.

WILLIAM GERALD FRIEDT, JR.

1 Q And let me ask you this, first
2 of all. Has anybody promised you anything,
3 paid you any money, promised you any money to
4 get you to come here today to make this
5 statement?

6 A No.

7 Q Has anybody threatened you in
8 any way? You're a pretty big guy. You don't
9 look like you'd be threatened by much. But
10 has anybody threatened you in any way to get
11 you to come here to make this statement?

12 A No.

13 Q So you've come here voluntarily,
14 and everything that you tell me is the
15 information you're volunteering to us; is that
16 right?

17 A Correct.

18 Q And you understand that the
19 court reporter has placed you under oath just
20 like you might be placed under oath in a court
21 of law if you testify; correct?

22 A Yes, I do.

23 Q Okay. Can you give me, first

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WILLIAM GERALD FRIEDT, JR.

1 of all, your business address and your home
2 address at this time.

3 A Home address is 133 Concord
4 Way, Cranberry Township, Pennsylvania 16066.

5 And what do you mean, "business"?

6 Q Who do you work for now?

7 A An explosive company.

8 Q Okay. And they're located here
9 in the Pittsburgh area?

10 A Yeah.

11 Q Okay. Can you tell me the period
12 of time that you worked for Metropolitan Life
13 Insurance Company, from what year to what year?

14 A Yeah. July of 1989 until, oh,
15 September of '93.

16 Q Okay. About four years, then?

17 A (Witness nods head.)

18 Q How did you come to be employed.
19 by Metropolitan? Did somebody recommend you
20 there, or did you see an ad in the paper?

21 A No. I had acquaintances,
22 friends, that worked there at the time.

23 Q Okay. Like who, for example?

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WILLIAM GERALD FRIEDT, JR.

1 A Well, Dan Weimer and Ron
2 Herrmann. I knew both of those guys.

3 Q Okay. They worked in the
4 Butler branch?

5 A Yes.

6 Q And when you went to work for
7 Metropolitan, did you go to work in the Butler
8 branch, also?

9 A Yes, I did.

10 Q The four years that you worked
11 there, was it all spent in the Butler branch?

12 A Yes, it was.

13 Q Okay. While you worked there,
14 was Craig Sabo the branch manager of that
15 office?

16 A Uh-huh, when I started there,
17 he was.

18 Q Okay. You're aware, are you
19 not, that Craig Sabo was terminated by
20 Metropolitan in about June of '91?

21 A Uh-huh.

22 Q Tell me what you know about the
23 circumstances surrounding his termination.

WILLIAM GERALD FRIEDT, JR.

1 A You're trying to make me remember
2 this. Really, the most I know about the
3 situation, there was a -- the regional manager,
4 Gary Antonino, dismissed Craig and I believe
5 moved or transferred Rick and Randy to another
6 office. Now, the situation surrounding that, I
7 know there was employee conflicts, problems,
8 things like that, that I guess was their
9 justification for termination.

10 Q Okay. Did you ever talk to
11 Gary Antonino about the reason why Craig was
12 terminated?

13 A To Gary, no.

14 Q Did you ever talk to Ron
15 Herrmann about the reason that Craig was
16 terminated?

17 A No.

18 Q Okay. Were you asked to write
19 a letter relating to Craig Sabo's performance
20 there at the office?

21 A Uh-huh.

22 Q Who asked you to write the
23 letter?

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1 A Mike George.

2 Q And what was Mike George's role
3 at that time when he asked you to write the
4 letter?

5 A I'd say training manager. He
6 could have been a salesman, also -- or he was
7 a salesman.

8 Q Did he work in the Butler
9 office?

10 A No.

11 Q Was he the training manager for
12 Western Pennsylvania?

13 A For the Butler region, the
14 Pittsburgh region.

15 Q Okay. And what were the
16 circumstances under which he asked you that?
17 Did he come to Butler and have a meeting with
18 you or call you, or how was it?

19 A No, I had a meeting at the
20 regional office with him on a Saturday
21 morning, and the reason I went to the meeting,
22 it was brought up to me that I should go to
23 the meeting because of a BMIT, it's a branch

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1 manager training, okay, for them putting me in
2 a branch manager position. The meeting was
3 about that to a certain degree, but it was
4 also about writing this letter for him or for
5 the region about Craig Sabo.

6 Q Was that after Craig had been
7 terminated?

8 A No, it was before.

9 Q Okay. Did other people from
10 the Butler office go to that same meeting?

11 A No. This was individual, mine
12 was.

13 Q Okay. And did somebody at that
14 meeting tell you what they wanted you to put
15 in the letter?

16 A We talked about what he was
17 looking for. We talked about the things that
18 had happened with just the employee problems
19 and stuff like that. He didn't exactly say
20 what to write in the letter, but, I mean, the
21 context was pretty well discussed.

22 Q Okay. Was there any discussion
23 with you about what might happen if you didn't

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1 write the letter?

2 A No, there really wasn't any
3 discussion about what would happen if I didn't
4 write the letter, but there was discussion
5 about what would happen if I did.

6 Q And what would happen if you
7 did write the letter?

8 A Well, like I said, with the
9 branch manager training, things like that, you
10 know, this is a new opportunity, career jump
11 and, you know, places to go, move up the
12 chain.

13 Q So Mike George said something
14 to you, suggested to you or at least you got
15 the understanding that if you wrote this
16 letter about Craig Sabo that you would have a
17 chance for advancement at Metropolitan?

18 A Yes.

19 Q Okay. And you said before
20 about you had discussions about employee
21 problems. What kind of employee problems was
22 there with Craig Sabo and, I guess, some of
23 the other employees that you're referring to

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1 at the Butler office?

2 A One of the main reasons I
3 believe they got rid of Craig was sexual
4 discrimination against a black woman who
5 worked in our office.

6 Q That was April Watt?

7 A That's correct.

8 Q Okay. Did that actually occur?
9 Was there racial -- let's talk about racial
10 discrimination, first of all. Craig's white.
11 April Watt's black. Was there any racial
12 discrimination on his part that you ever saw?

13 A In jest? You have to, I guess,
14 understand the situation. There were racial
15 slurs used, but not just by him, by everybody,
16 but it was made out as all fun intended. I
17 mean, no one ever got mad about it. No one
18 ever took it seriously. I mean, they would --
19 or back and forth.

20 Q Okay.

21 A It was never intended to
22 intimidate or --

23 Q Let me ask you this. I've

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1 talked to some people about April Watt. She
2 apparently was a very outgoing, very humorous
3 kind of person.

4 A Uh-huh.

5 Q She liked to participate in
6 these kind of jokes and things like that;
7 didn't she?

8 A Right.

9 Q And wasn't there also maybe
10 some discussions, off-color jokes and things
11 like that that went back and forth --

12 A Sure.

13 Q -- between April and other
14 people in the office?

15 A Sure.

16 Q And you probably told some
17 off-color jokes to April and said some
18 off-color things to her from time to time.

19 A I'm sure I've told jokes.

20 Q Yeah.

21 A Yeah.

22 Q And did you hear other people
23 in the office telling her jokes --

WILLIAM GERALD FRIEDT, JR.

1 A Sure.

2 Q -- and making remarks to her?

3 A (Witness nods head.)

4 Q And she never did, really,

5 complain about any of this; did she?

6 A No, not at all, no.

7 Q Okay. How about sexual type of

8 jokes, sexual type of innuendo, things like

9 that? Did that go back and forth?

10 A Uh-huh.

11 Q Between her and a lot of other

12 people in the office?

13 A Uh-huh.

14 Q Okay. Did she ever express to

15 you any particular concern about anything that

16 Craig Sabo said to her?

17 A No, no, not until it came to a

18 head, and then everything was modified or

19 magnified just to look a little larger than it

20 was.

21 Q Okay. Was there some

22 disagreement between Craig Sabo and April

23 Watt?

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1 A Oh, of course there were, but
2 there were disagreements -- I mean, most of
3 them were self-caused. He was the manager.
4 She was an employee.

5 Q Okay. Did those disagreements
6 have anything to do with her race or sexual
7 harassment, as far as you were able to
8 observe?

9 A No, they weren't caused by
10 that. It was work related, but, no, they
11 weren't.

12 Q In other words, he would
13 criticize her maybe about the way she was
14 performing her job, she wasn't keeping up with
15 her paperwork, she wasn't --

16 A Sure.

17 Q I'm sure that there's more to
18 selling insurance than just meeting with
19 people. You have to document things and so
20 forth?

21 A Uh-huh.

22 Q And she wasn't doing that
23 properly, and he would get on her from time to

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1 time; is that right?

2 A Uh-huh. The same way he would
3 do with anybody else.

4 Q Okay. Do you believe that this
5 sexual harassment -- well, let me back up a
6 minute. You're aware that April Watt sued
7 Metropolitan and Craig Sabo alleging racial
8 discrimination, alleging sexual harassment and
9 alleging that she was physically threatened by
10 Craig Sabo? Are you aware of all that?

11 A The first two. The latter, no.

12 Q Okay. Do you believe that
13 that was all just made up as an excuse for
14 terminating Craig Sabo?

15 A Like I said before, I think it
16 was modified or magnified to make it look
17 worse than it was, yeah.

18 Q Did you ever see any of that?
19 In other words, did you ever see anything that
20 you would consider to be Craig Sabo sexually
21 harassing April Watt, did you ever see
22 anything that you believed to be racial
23 discrimination by Craig Sabo against April

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1 Watt or did you ever see him physically
2 threaten to hurt her or harm her in some way
3 if she didn't do something?

4 A No, never physically harm her
5 or threaten her. But like I said about the
6 racial discrimination, it was mostly in jest.
7 There was never anything intimidating or mean
8 about it.

9 Q So when you had that meeting
10 there with Mike George, you said that was
11 before Craig was terminated?

12 A Yeah.

13 Q Approximately how long was it
14 before he was terminated? A matter of a month
15 or --

16 A Two weeks, three weeks.

17 Q Okay. And did you learn
18 whether or not other people who worked in the
19 office were also asked to write letters?

20 A I knew some of them did or were
21 asked to, yeah.

22 Q Did you have any discussions
23 with them at that time? In other words, maybe

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1 you'd come back to that office in Butler a few
2 days later, after you have your meeting with
3 George. Did you discuss with anybody else
4 whether they'd had similar meetings?

5 A No, no. But, I mean, you have
6 your coffee pot seminars where you sit around
7 and talk about what's going on.

8 Q And do you have a copy of that
9 letter that you wrote?

10 A No.

11 Q Do you remember what was in it?

12 A Very vaguely. I wrote it on
13 the morning he wanted me to turn it in. It
14 was real short. It talked about -- I don't
15 know. I can't remember. To be quite honest
16 with you, I'd have to see it again.

17 Q Well, do you remember generally
18 what it -- I mean, in the letter did you
19 accuse Craig Sabo of racial discrimination?

20 A I said there were racial slurs
21 used. I didn't say whether they were, like I
22 told you, out of jest or anything, but there
23 were racial slurs used, yeah.

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WILLIAM GERALD FRIEDT, JR.

1 Q Well, when you wrote the
2 letter, your belief was that if there were
3 racial slurs used they were just in jest, like
4 everybody did in the office?

5 A You know, I wanted to write the
6 letter and get the thing over with. It was --

7 Q Well, let me ask you this.
8 Would you have written that letter had you not
9 been promised something by Mike George?

10 A Well, it was that, and just
11 there were a few steps along the line that it
12 was made to seem exciting or, you know, the
13 power's going this way and you got to get on
14 if you ever want to go anywhere with this
15 company, things like that.

16 Q In other words, there was kind
17 of a feud between Craig Sabo and other people
18 at Metropolitan; wasn't there?

19 A Uh-huh.

20 Q And the other people being Gary
21 Antonino and Mike George and Richard Antonino
22 and that group; correct?

23 A Correct.

WILLIAM GERALD FRIEDT, JR.

1 Q And so you were told, basically,
2 "You have to help us get rid of Craig Sabo,
3 because we're going to be the people in power,
4 and he's not, and you better help us"? That's
5 basically what you were told?

6 A I guess you could put it that
7 way, yeah.

8 Q What were you told to do with
9 this letter?

10 A Write it and give it to Mike
11 George. He's the one that asked me to write
12 it.

13 Q Okay. Did you write it that
14 same day that --

15 A No, I wrote it -- it was
16 probably two to three weeks later. It was on
17 the morning he wanted it.

18 Q Okay.

19 A I waited until the last minute
20 to write it. I wrote it in the morning,
21 before I even went to the office.

22 Q Handwritten?

23 A Handwritten on legal paper. It

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1 was one page, one side, as far as I can
2 remember. I mean, it wasn't anything special.

3 Q Okay. And you believe in there
4 you talked about racial slurs that you've said
5 were --

6 A Sure.

7 Q -- happened, but they were in
8 jest?

9 A Uh-huh.

10 Q Did you talk about any sexual
11 harassment in there?

12 A No.

13 Q Did you talk about Craig's job
14 performance, the way you believe that he was
15 performing his job as branch manager?

16 A I might have touched on it, but
17 it was vague.

18 Q Yeah. Did you have any
19 criticisms that you believe were valid
20 criticisms about the way he did his job as
21 branch manager?

22 A I couldn't say. It's been so
23 long, I don't remember.

21

WILLIAM GERALD FRIEDT, JR.

1 Q Okay. Was there any discussion
2 at that time about the fact that April was
3 going to file a lawsuit against Craig or
4 Metropolitan?

5 A There was some discussion,
6 yeah.

7 Q By whom?

8 A By her.

9 Q Okay. And did she tell you why
10 she was thinking about that, or what did she
11 tell you about this upcoming lawsuit?

12 A Personally, she never told me
13 anything. It was me hearing it from other
14 people or --

15 Q Okay. And what did you hear
16 about the lawsuit?

17 A That she was suing for racial
18 discrimination because he was -- what's a good
19 word for it? Mental distress.

20 Q Okay. Do you know whether or
21 not anybody asked her to file that lawsuit?

22 A No.

23 Q You never heard anything about

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1 that?

2 A Huh-uh.

3 Q Did you ever hear that Gary
4 Antonino told her that she should file the
5 lawsuit?

6 A I could say honestly that they
7 talked about it, yeah.

8 Q Who talked about that?

9 A April and Gary.

10 Q When was that that they talked
11 about it?

12 A I'd say before and after it
13 happened.

14 Q Okay. Before and after the
15 firing?

16 A Uh-huh.

17 Q We have the firing, and, of
18 course, the lawsuit came later.

19 A Right.

20 Q But you're saying that the
21 lawsuit was discussed between Gary and April
22 before the firing --

23 A Sure.

23

WILLIAM GERALD FRIEDT, JR.

1 Q -- of Craig Sabo and after?

2 A Uh-huh.

3 Q Okay. And did you overhear
4 that conversation?

5 A No.

6 (Brief interruption.)

7 BY MR. PARRY:

8 Q Okay. I was asking you if you
9 personally overheard conversations between
10 Gary Antonino and April Watt about the
11 lawsuit.

12 A Correct. No, I never did.

13 Q Okay. But you heard something
14 about it from somebody else?

15 A Sure. I would hear April
16 talking about it.

17 Q What was it she was saying?

18 A I couldn't really say.

19 Q Was she saying that Gary
20 Antonino wanted her to file a lawsuit against
21 Craig Sabo?

22 A I could say that Gary Antonino
23 would help her file a lawsuit or assist her or

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1 they talked and decided that was the correct
2 thing to do.

3 Q Okay. You know Joe Phillips;
4 don't you?

5 A Uh-huh.

6 Q He worked in the same office
7 with you there?

8 A Right.

9 Q We took his statement in here
10 yesterday, and he said that April told him
11 that she had a conversation or maybe more than
12 one conversation with Gary Antonino --

13 A Okay.

14 Q -- that he told her that she
15 should file a lawsuit against Craig Sabo and
16 that she should also make Metropolitan a party
17 in the lawsuit, sue Metropolitan also.

18 Did you ever hear that, that
19 there was any discussion between Gary and
20 April about who to put in the lawsuit or how
21 she should file a lawsuit?

22 A No.

23 Q Okay. Do you believe that

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1 everything that you wrote in your letter was
2 truthful?

3 A It was truthful, yeah. It was
4 completely truthful. It could have been maybe
5 at the time somewhat vindictive or rehearsed.

6 Q Were you upset at Craig Sabo at
7 the time?

8 A No, actually, I wasn't. It was
9 all real fast moving, confusing. I was young,
10 new in the business. It seemed like the thing
11 to do, you know, following the parade.

12 Q You wanted to get ahead at that
13 time and just --

14 A Well, not so much get ahead.
15 It was -- you know, I'm not really one to sit
16 on the fence, but sometimes you choose the
17 wrong side or whatever.

18 Q After you wrote the letter,
19 what did you do with it? Did you give it to
20 Mike George?

21 A Uh-huh.

22 Q Personally give it to him or
23 send it?

WILLIAM GERALD FRIEDT, JR.

1 A Yeah, I believe so, in the
2 morning at the office.

3 Q Okay. At the Butler office?

4 A Uh-huh.

5 Q He came there to get the
6 letter?

7 A Well, that's, I believe, after
8 Craig had been dismissed and he was interior
9 branch manager or -- interior branch manager.

10 Q Okay. So he was actually
11 working in Butler at the time?

12 A Correct.

13 Q And did he look at the letter
14 and make any comment to you about the letter?

15 A He made a comment after he read
16 it, yes, something to the effect that he
17 wasn't completely satisfied with what I wrote.

18 Q "Is that the best you can do,"
19 is that what he said?

20 A Something like that, yeah.

21 Q And what did you tell him?

22 A I said yes.

23 Q Okay.

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WILLIAM GERALD FRIEDT, JR.

1 A See, I really didn't want to
2 write the letter, but I did it anyways. I
3 regretted it ever since I did it.

4 Q Why do you regret it?

5 A Just because I shouldn't have
6 wrote it. Like I said, following the parade,
7 being behind everybody.

8 Q Do you feel like that your
9 letter was part of an effort on the part of
10 Gary Antonino and others to unjustly fire
11 Craig Sabo?

12 A It was meant to fire him, yeah.
13 They were using that as some type of an
14 evidence or justification, sure.

15 Q What do you believe is the real
16 reason why Gary Antonino and others who were
17 close to him wanted to get rid of Craig Sabo?

18 A As far as I know, and this is
19 coming from a salesman who didn't really hear
20 anything except what possibly Rick would tell
21 me, was they just really didn't get along very
22 well, Craig and Gary. I know they would argue
23 or fight, what have you, back and forth, but,

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1 see, that was never evident to us.

2 Q Did they have disagreements
3 about ethics, about the proper sales practices
4 to use and things like that?

5 A I'm sure they did.

6 Q How are you sure they did? Did
7 you overhear that, or was that just kind of
8 common knowledge in the office?

9 A Well, we had a few problems at
10 the Butler office with, oh, I guess the way
11 things were sold or --

12 Q What kind of problems?

13 A Oh, underwriting problems,
14 using money that you shouldn't use, things
15 like that.

16 Q Churning?

17 A Sure.

18 Q Okay. Did Craig try to
19 discourage churning?

20 A For the most part.

21 Q Did Gary Antonino try to
22 encourage churning?

23 A Not to me, he didn't, but I

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1 really never talked to him.

2 Q Did Gary Antonino ever attempt
3 to send other agents into the Butler office
4 who weren't based there, such as Ron Schram or
5 Joel Sherman or Richard Antonino? Did he ever
6 attempt to send them in there to that office
7 to work with you agents in that office to go
8 out and churn your customers?

9 A While Craig was there or not?

10 Q Yes.

11 A I would say he might have
12 attempted to. He never did, as far as I can
13 remember, while Craig was there.

14 Q How about after Craig left?

15 A There was no one who ever
16 worked from our office, but there were agents
17 who worked with the people in my office, yeah.

18 Q And who were those agents? The
19 people I mentioned?

20 A Joel Sherman was one.

21 Q Okay.

22 A I think he was the only one who
23 really ever did any work.

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WILLIAM GERALD FRIEDT, JR.

1 Q Did you ever hear the term
2 "juice" used?

3 A Sure.

4 Q What's juice in the context of
5 Metropolitan Life Insurance policyholders?

6 A Juice is cash value.

7 Q In existing policies?

8 A Yeah.

9 Q And did you ever hear the term
10 "working the juice"?

11 A Yeah. It's pretty --

12 Q And you know what that means
13 when I say "working the juice"?

14 A Uh-huh.

15 Q And isn't it a fact that Joel
16 Sherman would work with agents in your office,
17 in the Butler office, and you'd go out and
18 work the juice with your customers?

19 A Yes.

20 Q Did he ever do that with you?

21 A No, never did.

22 Q Did he ever do it with Joe
23 Phillips?

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1 A Yes.

2 Q Who else did he work with when
3 he was working the juice?

4 A Mainly Joe from my office.

5 Q Okay. How about Ron Schram?
6 Did he ever work with anybody in your office?

7 A No.

8 Q Richard Antonino?

9 A No.

10 Q Have you been interviewed by
11 attorneys for Metropolitan?

12 A Huh-uh.

13 Q Have you been interviewed by
14 the Insurance Commissioner's office?

15 A No.

16 Q Are you in any trouble with the
17 Insurance Commissioner's office?

18 A No.

19 Q Do you still have a license to
20 sell life insurance?

21 A Uh-huh.

22 Q You also know Rick Sabo; is
23 that right?

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WILLIAM GERALD FRIEDT, JR.

1 A Yes, I do.

2 Q And Rick worked in the Butler
3 office with you?

4 A Uh-huh.

5 Q And then was Rick transferred
6 at some point in time?

7 A Right after Craig was dismissed.

8 Q Okay. And where was he
9 transferred to?

10 A I believe North Hills.

11 Q Okay. And did anybody ever
12 discuss with you the reasons for his transfer?

13 A Personally, no, never told me
14 exactly why, but I'm sure it would have to do
15 with Craig being dismissed. They're brothers,
16 and they moved him.

17 Q Okay. Why would they move him
18 because his brother was dismissed? What would
19 be the reasoning behind that?

20 A Oh, it seems pretty evident.
21 You get rid of your brother -- if you have a
22 brother and someone gets rid of him, whether
23 right or wrong, it's still going to annoy you

WILLIAM GERALD FRIEDT, JR.

1 or make you mad, aggravate.

2 Q Did you ever talk to Mike
3 George about the reasons why Rick was moved?

4 A No.

5 Q Did you ever talk to Gary
6 Antonino about it?

7 A No, I never really talked to
8 Gary about anything.

9 Q Okay. Do you know that Rick
10 was later terminated from Metropolitan?

11 A Uh-huh.

12 Q Do you know the circumstances
13 surrounding that?

14 A No, I don't.

15 Q Have you ever discussed that
16 with anybody, I mean, whether it was anybody
17 who knew about it or just discussions in the
18 office?

19 A No.

20 Q Scuttlebutt?

21 A No.

22 Q Do you believe that that had
23 anything to do with Craig's termination?

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WILLIAM GERALD FRIEDT, JR.

1 A No, I don't believe it did.

2 Q Okay. Have you ever discussed
3 with Rick Sabo anything that you knew about
4 his termination?

5 A No, no. I haven't really even
6 talked to Rick for the last -- well, he was
7 gone, what did you say, May -- June of '91?

8 Q That's when Craig left. I
9 think Rick was gone sometime after that.

10 A Probably since then.

11 Q Okay. Are you aware of any
12 reasons that would justify Rick being
13 terminated?

14 A No, no. He was out of my
15 office. Like I said, I don't really hear
16 much.

17 Q Okay. Have you talked to Craig
18 Sabo since '91?

19 A No.

20 Q You left Metropolitan in '93,
21 did you say?

22 A Yes.

23 Q Why did you leave there?

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WILLIAM GERALD FRIEDT, JR.

1 A Tired of the career, didn't
2 really like the business anyways.

3 Q There was a point in time when
4 there started to be a lot of bad publicity
5 about Metropolitan in the Pittsburgh area; is
6 that right?

7 A Yeah.

8 Q Was it after that that you
9 left?

10 A It was almost right at the same
11 time or a little bit before.

12 Q Okay. Had you ever worked for
13 an insurance company before you went to work
14 for Metropolitan?

15 A No.

16 Q Did you go to any training
17 prior to becoming an agent for Metropolitan?

18 A Prior to, no.

19 Q How did you receive your training
20 in how to sell life insurance?

21 A Metropolitan's few small
22 meetings, training in the office.

23 Q Basically, you got your training

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WILLIAM GERALD FRIEDT, JR.

1 in Butler, then?

2 A Sure.

3 Q You didn't go to Johnstown or
4 anywhere else to get training?

5 A No, no. I went to one meeting
6 when I was hired. I believe it lasted a week.

7 Q Okay. And who was the person
8 who was primarily responsible for training
9 you?

10 A (No response.)

11 Q Did they send somebody in, like
12 Mike George, into the office to train you, or
13 did you just pick up things in the office?

14 A In the office, no, it was all
15 hands on with your fellow employees.

16 Q Okay. As you were learning the
17 business, did you learn about churning?

18 A Yeah.

19 Q About using cash value in
20 existing policies to purchase new policies?

21 A Uh-huh.

22 Q Did you do that yourself?

23 A Yeah.

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WILLIAM GERALD FRIEDT, JR.

1 Q Churn customers?

2 A I've rolled a policy before,
3 yes.

4 Q Okay. Was that something that
5 was done frequently by agents in that office
6 that you're aware of?

7 A Frequently, I couldn't say for
8 sure.

9 Q It was done fairly regularly,
10 if not frequently; was it not?

11 A It was done. As far as I know,
12 there's a proper way and improper way to do
13 it. You know, there's replacement forms that
14 need to be signed, require full disclosure if
15 they know what they're doing and the reasons
16 why. I would have no problem doing it myself
17 with my own life insurance as long as it's
18 done correctly and for the right reason.

19 Q Okay. If you were asked
20 whether or not in your view, based on
21 everything that you knew about the situation,
22 whether or not Craig Sabo was properly
23 terminated --

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WILLIAM GERALD FRIEDT, JR.

1 A Uh-huh.

2 Q -- your opinion would be that
3 he was not; is that correct?

4 A Without knowing the whole
5 situation, I would say he was not.

6 Q Okay. And if you were asked
7 about whether Rick Sabo was terminated for the
8 right reasons or the wrong reasons, would you
9 have any knowledge about that?

10 A No, I couldn't say anything
11 about that. It was out of my line of fire.

12 Q Do you know who else wrote
13 these letters similar to yours?

14 A No.

15 Q You are aware that there was
16 more than one person in that office who wrote
17 these letters?

18 A Uh-huh.

19 Q In April Watt's lawsuit that
20 she filed in court, here are some statements
21 that are made. See, that's the lawsuit here,
22 April's (indicating).

23 A Okay.

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1 Q U.S. District Court, Western
2 District of Pennsylvania, April Watt versus
3 Metropolitan and Steven Craig Sabo.

4 A Okay.

5 Q "During the course of her
6 employment, Ms. Watt was subjected to blatant
7 overt acts of sexual and racial discrimination
8 propounded by Defendant Sabo and others in the
9 office."

10 Now, your testimony on that
11 subject would be that just didn't happen; did
12 it?

13 A It happened, but it was never,
14 like I said, intimidating or meant to
15 discriminate, put in your place or whatever
16 you'd like to say. It was always made out of
17 jest.

18 Q As a matter of fact, April was
19 pretty well liked by most of the people in the
20 office?

21 A Sure, sure. And she would
22 racially discriminate herself, too, actually.

23 Q And anything that was said to

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WILLIAM GERALD FRIEDT, JR.

1 her of that nature, she took it in fun --

2 A Uh-huh.

3 Q -- and returned fire kind of in
4 fun; didn't she?

5 A Sure.

6 Q She would call you or others
7 maybe honkeys and things like that?

8 A Absolutely.

9 Q Okay. It says, "These actions
10 consisted of derogatory statements being made
11 at meetings and in private conferences with
12 the Plaintiff." It goes on to say, "Physical,
13 sexual assaults of the Plaintiff." Did you
14 ever see any physical or sexual assaults of
15 her --

16 A No.

17 Q -- by Craig Sabo?

18 A No.

19 Q It says, "Criticisms of
20 Plaintiff based upon her race." Did you ever
21 see any of that?

22 A The same thing I said before.

23 Q Just in jest?

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WILLIAM GERALD FRIEDT, JR.

1 A Uh-huh. Yeah, the word
2 "nigger" was used, but it was not -- the same
3 way the word "honkey" would have been used.

4 Q Just in jest?

5 A Correct.

6 Q Okay. It says here, "She was
7 treated as an inferior person." Is that
8 correct?

9 A I would say no.

10 Q It says, "These actions were
11 often accompanied by threats of physical and
12 financial harm." Did that happen?

13 A Not to my knowledge.

14 Q Do you have any other facts that
15 you're aware of relating to the termination of
16 Craig Sabo or Rick Sabo that I haven't asked you
17 about already?

18 A No, I don't.

19 Q Okay. Once again I'll ask you,
20 you've given this statement now. Everything
21 that you've said was said voluntarily and you
22 weren't threatened in any way, you weren't
23 promised any money or anything else to come here

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WILLIAM GERALD FRIEDT, JR.

1 and give this statement; correct?

2 A No, I was not.

3 MR. PARRY: Okay. Thank you
4 very much.

5 THE WITNESS: You're welcome.
6 - - -

7 (At 9:50 a.m., the statement
8 was concluded.)
9 - - -

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1 COMMONWEALTH OF PENNSYLVANIA)
 2 COUNTY OF ALLEGHENY) SS:
)

3 I, Janice G. Karl, Notary Public within
 4 and for the Commonwealth of Pennsylvania, do
 5 hereby certify that before the taking of his
 6 statement, the said witness, WILLIAM GERALD
 7 FRIEDT, JR., was by me first duly sworn to
 8 testify to the truth, the whole truth, and
 9 nothing but the truth, and that the above
 10 statement was recorded in stenotype by me and
 11 reduced to typewriting under my direction.

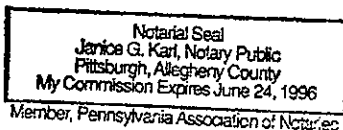
12 I further certify that the reading and
 13 signing of the transcript of his statement
 14 were waived by the witness and by counsel for
 15 the respective parties and that the said
 16 statement constitutes a true record of the
 17 testimony given by the said witness.

18 I further certify that I am not a
 19 relative or employee or attorney or counsel of
 20 any of the parties, or a relative or employee
 21 of such attorney or counsel, or financially
 22 interested directly or indirectly in this
 23 action.

14 I further certify that the said
 15 statement was taken before me at the time
 16 and place specified in the notice.

17 IN WITNESS WHEREOF, I have hereunto
 18 set my hand and affixed my seal of office at
 19 Pittsburgh, Pennsylvania, this 15th day of
 20 August, A.D., 1994.

21 *Janice G. Karl*
 22 Janice G. Karl
 23



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